



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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April 5, 1999

Linda J. Matthews
Environmental Analyst
JBR Environmental Consultants, Inc.
8160 South Highland Drive
Sandy, Utah 84093

Re: Comments on the March 3, 1999, Environmental Assessment (EA) No. UT 080-1999-14 for S.F. Phosphates Limited Company, Tailings Storage Facility (TSF) Expansion, M/047/007, Uintah County, Utah.

Dear Ms. Matthews:

The Division Minerals Regulatory staff have reviewed the EA for SF Phosphates' TSF Expansion and offer the comments listed on the separate attachment. The comments focus on minor corrections to the EA and clarifications regarding Division regulations.

The active phosphate mining operation and TSF are currently permitted with the Division as a Large Mining Operation Notice of Intention under file number M/047/007. The proposed expansion to the existing TSF would be categorized under the Division's Minerals Rules as an amendment/revision to this existing large mining notice. The Minerals Rules apply to disturbances on state, federal and patented lands. The September 17, 1998 Plan Of Operations (POO) describes the proposed operations on federal lands, and does not meet the requirements of the Minerals Rules for an amendment/revision to an existing large mine operation notice. Division comments on the POO will be provided under separate cover.

If you have any questions regarding this letter you may contact me by phone at (801) 538-5267.

Sincerely,

Anthony A. Gallegos
Senior Reclamation Specialist

jb
Attachment: Comments on EA
cc: Duane DePaepe, BLM Vernal FO
Ron Ryan, SF Phosphates
o:\review\sf-eacom.doc

**DIVISION OF OIL, GAS & MINING COMMENTS
ON SF PHOSPHATES EA NO. UT 080 1999-14
APRIL 5, 1999**

Section 1.2 of the EA describes split estate lands as being lands within "*T.3S., R.21E., Sec. 1 Lots 1-3*". A typographical error is suspected for Sec. 1.

Section 2.2.2 describes the potential borrow areas for construction materials to increase the dam height. The September 17, 1998 POO describes one proposed construction material borrow area which is not identical to the areas shown in the EA. This may or may not be a significant conflict.

Section 2.2.5 describes the permits and approvals related to the current tailings facility and proposed tailings expansion. This tailings expansion requires the submission of a permit amendment/revision to the existing approved Large Mine Operation Notice of Intention. M/047/007 on file with the Division. The permit amendment/revision will need to address new disturbances on federal and private lands. If the submission is found to be a significant change to the existing large mine notice the submission would be categorized as a revision. A revision requires a 30-day public comment period after reaching a level of technical adequacy and receiving tentative approval from the Division.

Section 3. describes the mineral reservations on "*Lots 1-4 in the N1/4 Section 6, T.3S., R.22E.*". There appears to be a typographical error in the quarter section description.

Table 31- describes the results of limited sampling along Big Brush Creek by SF Phosphates. What is the date of the sampling?

Appendix D describes the Reclamation Plan and potential reclamation species seed mixtures for the various types of tailings areas. Section 4.F.d references tables 9 through 12, yet these tables could not be found in the EA document.

In order for a reclaimed area to be considered successful under the Minerals Rules, the vegetative ground cover needs to be at least 70% of the pre-existing ground cover. The EA identifies the project area as a mountain shrub community; however, no survey of vegetative cover is included. It is assumed that the amount of vegetative cover would be similar to other mountain shrub communities in the area.

The potential reclamation species lists (Tables 9-12) contain several species that should be adaptable to the conditions that will exist at the time of final reclamation. The Division concurs that testplots should be implemented as soon as possible to determine exact species and rates that will be used for reclamation. The Division requests to be involved with the development of the test plot protocol as this information will be useful for reclamation of the entire TSF involving federal and private lands. As the final seed mixes are developed, consideration needs to be given to the seed mixes used on adjacent non-federal lands (one seed mix that can be agreed upon by all parties for each area should be preferred to having separate mixes for areas based only on political boundaries).

It needs to be pointed out that Table 11 of the POO, Potential Reclamation Species Sand Beach, does not include any forbs. A minimum of 2-3 forb species should be included in all revegetation seed mixes to increase diversity and ecological stability.